

REMARKS

Claims 1-17 are pending in this application after this Amendment; claims 1, 5, and 9 being independent. In light of the amendments and remarks contained herein, Applicant respectfully requests reconsideration and withdrawal of the outstanding rejections.

In the outstanding Official Action, the Examiner objected to claim 5. The Examiner further rejected claims 1-12 under 35 U.S.C. § 103(a) as being unpatentable over Ota (JP 08-340398) in view of *Shintani et al.* (USP 4,992,875). Applicant respectfully traverses these rejections.

Claim Objections

With regard to the Examiner's objection to claim 5, by this Amendment, Applicant has amended claim 5 to replace "generation means" with "generator" as suggested by the Examiner. Based upon this amendment, it is respectfully requested that the outstanding objection be withdrawn.

Claim Rejections - 35 U.S.C. § 103

With regard to the Examiner's rejection of claim 1 under 35 U.S.C. § 103(a) as being unpatentable over Ota in view of *Shintani et al.*, the Examiner asserts that Ota teaches a format conversion means that converts the format of the digital image signal into predetermined format used in digital cameras separate from the

digital image generation means, citing to the Constitution (or Abstract), lines 2-3. Applicant respectfully disagrees with the Examiner's characterization of this reference.

It is respectfully submitted that the Ota disclosure is directed to an image information recording device used in a digital photograph processing system where the image information recording device stores the image information converted into digital image data. Ota seeks to solve the problem of having a CD being used as an image information storage medium where writing to the CD can be performed once. Where the image information is subsequently manipulated, the image information file cannot be rewritten to the CD (§ 6). Additionally, Ota notes an additional problem where the digital still camera is developed apart from the standard digital photograph processing system and the digital still camera stores a photograph as digital image data and the image data that is input in the digital still camera cannot be processed with the new digital photograph processing system (§ 8).

Ota describes a system where film is scanned by scanner 11 and converted to digital image data (§ 16). Additional image processing occurs at image-processing section 12 and memory section 13 (§§ 17-19). The processed image data is displayed on a CRT (§ 20) and subsequently stored in a mini-disk which is used as a rewritable

image information storage medium. The data is written in JPEG format (§ 21).

Ota continues on to note that image information which is obtained with digital still camera 4 is input into the control section 30 and is processed similarly to the image data that is retrieved from scanner 11 (§ 22).

In contrast, the present invention as set forth in claim 1 recites, *inter alia*, an image conversion system comprising a format conversion means which converts the format of the digital image signal into a predetermined format used in a digital camera separate from the digital image generation means. It is respectfully submitted that nowhere does Ota teach or suggest a format conversion means for converting the format of the digital image signal into a predetermined format used in a digital camera separate from the digital image generation means. As noted above, Ota merely teaches that image data that is retrieved from a digital still camera can be processed similarly to image data that is retrieved from a scanner.

It is respectfully submitted that *Shintani et al.* fails to cure the deficiencies of the teachings of Ota as *Shintani et al.* fails to teach or suggest the format conversion means as set forth in claim 1. Thus, as neither Ota nor *Shintani et al.* teach or suggest the format conversion means as set forth in claim 1,

assuming these references are combinable, which Applicant does not admit, it is respectfully submitted that claim 1 is not obvious over Ota in view of *Shintani et al.*

Further, Applicant respectfully traverses the Examiner's assertion that it is inherent that JPEG files can be used in digital cameras. It is respectfully submitted that not all digital cameras can read JPEG files.

Finally, the Examiner asserts that although Ota fails to teach the image signal recording means of claim 1, the Examiner asserts that *Shintani et al.* cures the deficiencies of the teachings of Ota by teaching a still video camera that uses a magnetic disk as the recording medium that can be loaded in the camera. Applicant respectfully disagrees with the Examiner's assertion. *Shintani et al.* discloses a still camera for recording an object image by making use of an electronic signal such as a still video camera. The camera is constructed so that a recording medium is positioned in a certain manner and captures images from the still camera (Abstract).

In contrast, the present invention set forth in claim 1 recites, *inter alia*, an image conversion system comprising an image signal recording means which records the digital image signal in the predetermined format on a recording medium which can be loaded in the digital camera. There is no teaching or suggestion in *Shintani*

et al. for providing for a recording medium that contains a digital image signal in a predetermined format which can be loaded in the digital camera. As such, it is respectfully submitted that *Shintani et al.* fails to cure the deficiencies of the teachings of *Ota*, assuming these references are combinable, which Applicant does not admit. Thus, claim 1 is not obvious over *Ota* in view of *Shintani et al.*

It is respectfully submitted that claims 2-4 and 13-15 are allowable for at least the reasons set forth above with regard to claim 1 based upon their dependency on claim 1. It is further submitted that claims 5 and 9 contain elements similar to those discussed above with regard to claim 1 and, thus, claims 5 and 9 are allowable for at least the reasons set forth above with regard to claim 1. Finally, it is respectfully submitted that claims 6-8 and 16 and 10-12 and 17 are allowable for the reasons set forth above with regard to claims 5 and 9, respectively, based upon their dependency on these allowable claims.

Conclusion

Should there be any outstanding matters that need to be resolved in the present application, the Examiner is respectfully requested to contact Catherine M. Voisinet (Reg. No. 52,327) at the telephone number of the undersigned below, to conduct an interview

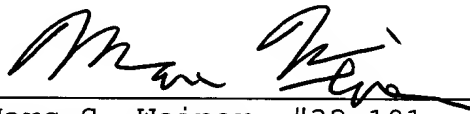
Appl. No. 09/172,665

in an effort to expedite prosecution in connection with the present application.

If necessary, the Commissioner is hereby authorized in this, concurrent, and future replies, to charge payment or credit any overpayment to Deposit Account No. 02-2448 for any additional fees required under 37 C.F.R. §§ 1.16 or 1.17; particularly, extension of time fees.

Respectfully submitted,

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